## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTY MARIE STINEBERT, : CHAPTER 13

Debtor

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JACK N. ZAHAROPOULOS,

STANDING CHAPTER 13 TRUSTEE, : CASE NO. 1:24-bk-02254-HWV

Movant

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VS.

CHRISTY MARIE STINEBERT,

Respondent :

## TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 21<sup>st</sup> day of February, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

- 1. The Debtor's Plan fails to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the Plan, as required by the Means Test. It should be \$18,667.80 per the Debtor's own Means Test.
- 2. The Debtor's Plan violates 11 U.S.C. § 1325(b)(1) in that the Plan does not provide for the payment of all the Debtor's projected disposable income for a minimum period of five (5) years.
- 3. The Debtor's Plan is underfunded since it does not pay the Means Test minimum to unsecured creditors, plus payments on secured debts.
- 4. The Debtor's Plan incorrectly states that the Debtor is below median income. Actually, the Debtor is above median income.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos, Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: <u>/s/ Douglas R. Roeder, Esquire</u>
Attorney for Trustee

## **CERTIFICATE OF SERVICE**

AND NOW, this 21<sup>st</sup> day of February, 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Chad J. Julius, Esquire Jacobson, Julius & Harshberger 8150 Derry Street Harrisburg, PA 17111-5212

/s/Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee